

**HAZARDOUS WASTE SECTION - COMPLIANCE BRANCH
FILE TRANSMITTAL & DATA ENTRY FORM**

Your Name: Jeff Menzel

Facility ID Number: NCR000159038

Facility Name: Horsehead Metal Products, Inc.

Document Group: Inspection/Investigation (I)

Document Type: I - Focused Compliance Inspection (FCI)

Description for File (for CARA): Site visit to determine compliance with spill work plan

Date of Document: 1/27/2016

Author(s) of Document: Jeff Menzel

Inspector ID #: NC014

Suborganization: Western Region

Comments for RCRAInfo:

County (if not on report):

**DIVISION OF WASTE MANAGEMENT (DWM)
HAZARDOUS WASTE SECTION (HWS) / COMPLIANCE BRANCH**

RCRA SITE VISIT REPORT

1. **Facility Information:** Horsehead Metal Products, Inc.
484 Hicks Grove Road
Mooresboro, North Carolina 28533
Rutherford County
EPA ID NCR000159038
2. **Facility Contact:** Mr. Jim Harris, Environmental Manager
3. **HWS-Inspectors:** Mr. Jeff Menzel, NC HWS-Environmental Senior Specialist
Mr. Brent Burch, Compliance Branch Head
4. **Date/Time of Investigation:** January 27, 2016 Arrived: 9:30am – Departed: 12:00pm
Date of Report: January 27, 2016 - Prepared By: Jeff Menzel
5. **Participants:** Mr. Brent Burch, NCDEQ
Mr. Jim Harris, Horsehead
Mr. Ali Alavi, Horsehead
Mr. Anthony, Staley Horsehead
Mr. Greg, Belland, Horsehead
6. **Purpose of Inspection:** Compliance Inspection
7. **Report:**

On January 27, 2016 Mr. Brent Burch and I conducted a compliance inspection at Horsehead Metal Products, Inc. in Mooresboro, North Carolina. The purpose of this announced site visit was to determine progress on assessment required as part of an IANOV 2016-006 issued by the Hazardous waste section.

The Site is approximately 196 acres in size and is located at 484 Hicks Grove Road in Mooresboro, North Carolina. Primary operations at the Site consist of zinc metal production via solvent extraction and electrowinning. On Saturday, September 5, 2015, an aqueous solution exhibiting low pH levels was observed in the energy dissipater at Basin 1 at the Site. Following an incident investigation, Horsehead personnel determined that the source was a release of an aqueous solution from the cell house.

Following an initial investigation, Horsehead personnel determined that a transfer pump in the cell house malfunctioned, which resulted in the release of an aqueous solution to the secondary containment below. Upon further investigation, a narrow open joint (since repaired) between the wall of a recirculation tank and the containment system below the cell house allowed an undetermined volume of aqueous solution to enter the subsurface. Once the source of the release was





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determined, Horsehead directed subcontractors to temporarily seal the storm water pipe with an air bladder, and perform a closed circuit television inspection of the storm water pipe in the vicinity of the cell house. Findings of the storm water inspection indicated that a pipe connection, located between storm water drains CB-74 and CB-73, had separated post construction (since repaired), which allowed an undetermined volume of the released aqueous solution to enter the storm water system.

The principal source of potential concern, which is the subject of this investigation, includes the presence of free liquid in the compacted stone layer underlying the cell house and surrounding paved areas. The primary data gathering objective is to determine if free liquid is present in the compacted stone layer, and if so, then to gather information on the composition of the liquid and areal extent of the liquid within that unit. This information will be used to develop a program to remove and reclaim the liquid, and to remove the principal source and the threat of potential migration from the area. In addition to gathering the information above, additional information as to the subsurface layers including the compacted fill unit and the elevation of the soil interface in the subsurface of the nearby area will be gathered. This work was scheduled to begin January 25, 2016.

10. Comments:

- The consultant was there boring holes and taking soil samples in the area. No free liquid was observed in the borings. Samples will be sent off for analysis to determine if RCRA metals are present. Three boring holes were observed and pictures were taken.
- In addition to discussing the assessment of the sulfuric acid release, the participants discussed the idling of the plant and potential RCRA issues that may need to be addressed depending on how long it's idled. According to Mr. Alavi, they were aware of the fact that idling of the plant for greater than 90-days subjects the process tanks, pipes, and other units to being regulated according to 40 CFR 261.4(c). The facility is taking steps to reduce the amount of material that may become subject to RCRA regulations as part of the idling.

02/03/2016

JEFF MENZEL, / DATE
NC HWS-COMPLIANCE BRANCH

MR. JIM HARRIS via email
FACILITY REPRESENTATIVE

CC:
Brent Burch, Compliance Branch Head
Central Office Files



State of North Carolina | Environmental Quality | Waste Management
1646 Mail Service Center | 217 West Jones Street | Raleigh, NC 27699-1646
919 707 8200 T



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